## REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments and arguments set forth fully below. Claims 31-33 were previously pending in the present application. Within the Office Action, claims 31-33 have been rejected. By the above amendments claims 31 and 33 are currently amended and new claims 34-57 are added. Accordingly, claims 31-57 are currently pending in this application. No new matter is contained within these amendments.

### Rejections under 35 U.S.C. 103(a)

Within the Office Action, claims 31-33 was rejected under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 6,374,226 to Hunt et al. (hereinafter referred to as "Hunt") in view of United States Patent No. 5,774,859 to Houser et al. (hereinafter referred to as "Houser"). The Applicant respectfully traverses this rejection because claim 1, as amended, contains further limitations not disclosed in the prior art references. Specifically, neither Hunt nor Houser disclose constructing a progressive hierarchy of operational refinement, by chaining commands together for each utterance that is explicitly linked to a further grammar, and by activating further grammars based on the context of the instructions contained in a previous grammar.

As explained within the Office Action, Houser discloses a system for controlling a device such as a television and for controlling access to broadcast information such as a video, but, as pointed out by the Examiner, Houser does not disclose the concept of linking grammars. Furthermore, Houser does not teach progressively building a hierarchy of operations.

The Examiner claims that Hunt teaches linking grammars such that the combination of Houser and Hunt render the Applicant's invention obvious. However, the Applicant would like to point out that the concept of "linking" as taught by Hunt is very much different than the concept of performing a series of operations by activating further grammars as taught by the present invention.

Hunt teaches a system of "links between the speech control modules [to] enable processing of recognition results by the speech controller modules in a way that reflects the reference structure of the corresponding components." (Col. 4, Lines 9-12). Essentially, Hunt teaches the idea of being able to cut up a grammar and reorganize it to make it easier to manage and construct. However, Hunt does not teach a method of accepting a series of user utterances and performing a series of operations by activating a series of grammars based on explicit chained command attributes contained within the grammars. Furthermore, Hunt does not disclose activating further grammars based on the contextual information attribute found within the preceding grammar.

On the other hand, the Applicant's present invention discloses this limitation expressly in claim 31, which claims a method for linking grammars into a hierarchy, comprising providing various grammars and "*accepting a series of user utterances; and performing a series of operations by activating further grammars, wherein for each user utterance that is explicitly chained to a further grammar, activating the further grammar; and for each user utterance having contextual information associated within, activating a further grammar based on the contextual information of a preceding grammar.* "

For at least this reason, Claim 31 is allowable over the teachings of Hunt and Houser. Claims 32 and 33 are also allowable because they contain the limitation by reference to claim 31.

Furthermore, new Claims 34-59 are introduced in the present amendment to precisely claim the types of operations used construct a hierarchy of commands for a speech module user interface according to the present invention. Therefore claims 34-59 contain similar novel features not found in Hunt or Houser.

Therefore, Claims 31-59 are all in condition for allowance.

## **CONCLUSION**

The Applicants respectfully request examination and reconsideration in view of the amendments above and remarks above.  Should the Examiner deem it helpful he is encouraged to contact Applicant's attorney, Michael Glenn, at (650) 474-8400.

Respectfully submitted,

Michael A. Glenn
Registration No.  30,176

Customer No.:  22,862